

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 17 B 26503  
Eulette Arrington-Harris, ) HON. Deborah L. Thorne  
 ) CHAPTER 13  
DEBTOR. )

**NOTICE OF MOTION**

TO: Chapter 13 Trustee Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604;

Cheryl A Considine, Heavney Beyers & Mihlar, PO Box 740, Decatur, IL 62525,  
representing Regions Bank d/b/a Regions Mortgage;

See Attached Service List.

PLEASE TAKE NOTICE that on July 15, 2020, at 1:30 p.m., I shall appear before the HONORABLE Deborah L. Thorne, or any judge sitting in that judge's place, and present the motion to reinstate the automatic stay, a copy of which is attached.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at [www.CourtSolutions.com](http://www.CourtSolutions.com) or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on July 8, 2020.

/s/ Rigoberto Garcia  
Attorney for Debtors  
The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625

Label Matrix for local noticing  
0752-1  
Case 17-26503  
Northern District of Illinois  
Eastern Division  
Wed Jul 8 16:07:29 CDT 2020

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

(p)BMW FINANCIAL SERVICES  
CUSTOMER SERVICE CENTER  
PO BOX 3608  
DUBLIN OH 43016-0306

CITY OF CHICAGO DEPT OF FINANCE  
WATER DIVISION  
333 S STATE ST #410  
CHICAGO, IL 60604-3983

City of Chicago - Dept of Finance - Water Di  
Po Box 6330  
Chicago, IL 60680-6330

(p)COMED  
1919 SWIFT DR  
OAKBROOK IL 60523-1502

Comcast  
41112 Concept Dr  
Plymouth MI 48170-4253

Comcast  
p.o. box 196  
Newark, NJ 07101-0196

Cook County Hospital  
25706 Network Place  
Chicago, IL 60673-1257

(p)DIRECTV LLC  
ATTN BANKRUPTCIES  
PO BOX 6550  
GREENWOOD VILLAGE CO 80155-6550

DISH NETWORK  
9601 S MERIDIAN BLVD  
ENGLEWOOD, CO 80112-5905

Department Stores National Bank  
c/o Quantum3 Group LLC  
PO Box 657  
Kirkland, WA 98083-0657

Dish Network  
PO Box 530714  
Atlanta, GA 30353-0714

HEAVNER BEYERS MIHLAR LLC  
111 E Main St # 200  
Decatur, IL 62523-1204

La Rabida Children's Hospital  
6501 S Promontory Dr  
Chicago, IL 60649-1002

MCYDSNB  
3911 S Walton Walker Blvd  
Dallas, TX 75236-1509

MCYDSNB  
9111 DUKE BLVD  
MASON OH 45040-8999

Navient  
PO BOX 9655  
WILKES BARRE, PA 18773-9655

Navient Solutions, LLC. on behalf of  
United Student Aid Funds, Inc.  
Attn: Bankruptcy Litigation Unit E3149  
PO Box 9430  
Wilkes Barre, PA 18773-9430

Peoples Gas  
PO BOX 2968  
Milwaukee, WI 53201-2968

Peoples Gas Light & Coke Company  
200 E Randolph Street  
Chicago IL 60601-6433

Provident Hospital  
500 E 51st St  
Chicago, IL 60615-2494

REGIONS BANK  
5014 POPLAR AVENUE  
MEMPHIS TN 38117-7604

Regions Bank  
3511 Camp Creek Pkwy  
Atlanta, GA 30344

Regions Bank dba Regions Mortgage  
PO Box 18001  
Hattiesburg, MS 39404-8001

United Student Aid Funds, Inc (USAF)  
PO Box 8961  
Madison WI 53708-8961

University of Chicago Medical Center  
800 E. 55th St  
Chicago, IL 60615-4906

direct tv  
P.O. Box 78616  
Phoenix, AZ 85062-8616

Aaron M Weinberg  
The Semrad Law Firm, LLC  
20 S. Clark St.  
28th Floor  
Chicago, IL 60603-1811

Alexander Preber  
The Semrad Law Firm, LLC  
20 S. Clark St, 28th Floor  
Chicago, IL 60603-1811

Eulette Arrington-Harris  
7710 S Bennett Ave  
Chicago, IL 60649-4606

Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604-2503

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Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

BMW FINANCIAL SERVICES  
5515 PARKCENTER CIR  
DUBLIN, OH 43017

(d)BMW FINANCIAL SERVICES  
Po Box 3608  
Dublin, OH 43016

ComEd  
3 Lincokln Cetre  
c/o Sabrina Copelan  
Villa Park, IL 60181

DIRECT TV  
PO BOX 9001069  
LOUISVILLE, KY 40290

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Regions Bank d/b/a Regions Mortgage

End of Label Matrix	
Mailable recipients	32
Bypassed recipients	1
Total	33

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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IN RE:	)	
	)	CASE NO. 17 B 26503
Eulette Arrington-Harris	)	HON. Deborah L. Thorne
	)	CHAPTER 13
DEBTOR.	)	

**MOTION TO REINSTATE AUTOMATIC STAY**

NOW COMES the Debtor, Eulette Arrington-Harris, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and moves this Honorable Court to reinstate the automatic stay, and in support thereof states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C §§1334 & 157. This is a core proceeding pursuant to 28 U.S.C. §157.
2. On September 2, 2017, Debtor filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
3. This Honorable Court confirmed the instant case on October 25, 2017.
4. On July 8, 2020, this Honorable Court entered Order Granting Motion for Relief from Debtor's Stay filed by Regions Bank d/b/a Regions Mortgage, which automatically modified the stay on the property commonly known as 7710 S. Bennett Ave, Chicago, IL 60649, due to lack of funds.
5. Debtor had the funds to tender on the day of court, however she was unable to bring them in prior to the hearing.
6. On July 8, 2020, Debtor tendered certified funds in the amount of \$11,899.00 to bring her substantially current on her post petition mortgage payments. Please see Exhibit A.

7. Debtor respectfully requests this Honorable Court to reinstate the automatic stay to the property commonly known as 7710 S. Bennett Ave, Chicago, IL 60649.

8. Debtor has filed the instant case in good faith and is in a position to proceed.

WHEREFORE, Eulette Arrington-Harris, Debtor, respectfully requests this Honorable Court approve:

- A. To enter an Order reinstating the automatic stay to the property commonly known as 7710 S. Bennett Ave, Chicago, IL 60649; and
- B. For such other and further relief as this Court deems fair and just.

Respectfully Submitted,

/s/ Rigoberto Garcia

Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625